



Alcoa

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Jeff Killelea
Water Quality Program
Washington Department of Ecology
P.O. Box 47696
Olympia, WA 98504-7696

Re: Comments on Draft Renewal Industrial Stormwater General Permit Renewal
Alcoa Inc.

Dear Mr. Killelea:

Alcoa Inc., one of the world's largest manufacturer of aluminum and aluminum products, is pleased to submit the following comments on the proposed renewal of the Industrial Stormwater General Permit (ISGP). Alcoa has several facilities located in the state of Washington that may be affected by the reissuance of this permit.

General Comments

1. Association of Washington Business – Alcoa facilities in the state are members of the Association of Washington Business (AWB) and fully support their comments and incorporate them into these comments by reference.
2. Use of Benchmark Values - The use of benchmark values in general storm water permits at the national level is being questioned. Recently, Alcoa participated in a meeting with EPA and several industrial organizations in Washington, DC concerning the use of benchmark values and their effectiveness/appropriateness in general permits. EPA had agreed in 2003 and again in 2008 to evaluate benchmark value monitoring conducted under their Multi-Sector General Permit (MSGP). To date, EPA has not done so. One organization did look at some of the submitted monitoring data, and its preliminary review is showing an inconsistent correlation between meeting a benchmark value and having an effective storm water pollution prevention plan. This can lead a discharger into an endless “do-loop” of continually monitoring, modifying its plan, with no discernible impact on its storm water discharges. EPA has agreed to continue discussions on this issue. Accordingly, Alcoa recommends that Ecology remove the benchmark values until it has determined the effectiveness of using such values.
3. Using ISGP Conditions in Individual NPDES Permits – Alcoa does not believe it is appropriate to utilize ISGP permit conditions in individual NPDES permits unless it can be demonstrated such conditions are specifically appropriate to that industrial site. The

required information necessary to obtain coverage under an individual permit versus the ISGP are sufficiently different in terms of detail and quantity, which typically means generic permit conditions of the ISGP do not readily mesh well in individual permits.

ISGP Specific Comments

1. Condition S3.A., page 13 – The permit provides no discernible means for a discharger to comply with the overall requirement of ensuring a facility's storm water pollution prevention plan (SWPPP) complies with AKART, does not cause or contribute to a violation of the Water Quality Standards, comply with the Clean Water Act's technology-based treatment requirements, have consistent and applicable best management practices via the appropriate state Stormwater Management Manual, and otherwise meet any and all other Ecology-approved guidance documents and manuals. Without such means a discharger can expend time and money without assurance the appropriate measures have been put in place. The permit needs to provide definitive means of determining compliance with this section.
2. Condition S3.A.3.c, page 13 – Alcoa requests that the documents listed in Appendix 10 of the Phase I Municipal Stormwater Permit be specifically listed in the ISGP. Otherwise a discharger is required to obtain a copy of another, unrelated permit to find out the requirements to which they are subject .
3. Condition S3.B.4.b.i.3).b), page 17 – The condition assumes all ponds, tanks/vaults, catch basins and so forth require the same maintenance at every type of industry in every climate condition covered by this permit. Alcoa recommends the condition be qualified by stating "Maintain as appropriate for your location and climate..."
4. Condition S3.B.4.b.i.7), page 19 – It is not clear in the second paragraph if all pressure washing water is considered process wastewater, or if only water associated with pressure washing of vehicles and equipment for cleaning purposes would be considered process wastewater.
5. S4.B.1.b., page 22 – Is the October 1st "first fall storm event" appropriate sampling for every permittee in every part of the state?
6. S5, page 25 – As discussed in General Comment 2 above, there is interest in discussing with EPA at the federal level the appropriateness of using benchmark values and their accompanying general permit requirements if a benchmark is exceeded. We have the same concern at the state level. Few peer-reviewed studies have been done to correlate the effectiveness or appropriateness of the benchmark procedure as used in the general permit program for industrial storm water. Alcoa believes Ecology needs to determine the effectiveness of utilizing its benchmark procedure in the ISGP.
7. S5.D.1.b.v., page 30 – Ecology needs to either provide specific information in the permit as to how a discharger is to evaluate whether the conditionally authorized non-stormwater discharges meets the state water quality standards or eliminate this provision. It is unlikely that the average discharger utilizing the ISGP would have the knowledge or

- expertise to make such an evaluation without specific guidance. Condition S10 does not provide specific information on how to comply with standards, including water quality standards.
8. S5.F, page 31 – How is a discharger to comply with preventing the discharge of floating debris since the permit does not contain a definition of “floating debris” or “debris.” Is this limited to industrial debris or debris in general (leaves, grass, sticks, and other natural debris which can float)? Also, there is no size limitation on said “floating debris.” Accordingly, Alcoa recommends that Ecology define “floating debris” and “debris,” including a size limitation.
 9. S6.C, page 32 – Alcoa agrees with the AWB comments regarding this section as it relates to discharges to the Puget Sound Sediment Cleanup Site, including the TSS limit of 30 mg/l which has not been justified. Ecology has not provided sufficient rationale for commenters to develop adequate technical comments on the proposed changes, therefore, this condition should be deleted from the final permit until such information is available for public comment.
 10. Condition S7.C1.f., page 37 – Is the certification required under this section the same as that shown in Condition G.2.D? If so, then Alcoa recommends referencing Condition G.2.D as to where the discharger can find a copy of the required certification language.
 11. Condition S7.D, page 38 – The cited condition S9.E, does not seem to be the correct citation. According to Condition S9.E, there are only two situations that require a report:
 - a. Non-compliance that “endangers human health or the environment.” Note that the permit does not define what constitutes endangerment of human health or the environment, so a permittee has no way of knowing if the cited condition applies to Condition S7.D.
 - b. Exceeding a numeric effluent limit (not a benchmark value).
 12. Condition S8, page 38 – The three levels of corrective action a permittee may have to undertake gets back to the issue of permit complexity, as well as the appropriateness of utilizing benchmark values. See General Comment 2 and Specific Comment 6. Ecology should either delete the condition or modify it so the average discharger utilizing the ISGP can make cost effective changes to the SWPPP that are warranted.
 13. Condition S9E, page 43 – As mentioned in Specific Comment 11, there is no definition of what constitutes “may endanger human health or the environment.”
 14. Condition S10, page 44 – Much like Specific Comment 1, this condition does not provide any specifics on what actions a discharger is to take to ensure compliance with standards.
 15. Condition G1, page 46 – This condition appears to be inconsistent with how the ISGP is to operate; namely, part of the SWPPP is to identify and self-correct situations where a pollutant is being discharged in quantities greater than the permit may “allow.” This condition is for individual permits and should either be eliminated or modified for use in the ISGP.

If you have any questions about this or would like to discuss these comments, please contact me at 412-553-8375 or via e-mail at kathy.martin@alcoa.com.

Sincerely,

A handwritten signature in cursive script, appearing to read "kathy l. martin".

Kathleen L. Martin
Alcoa Inc.